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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LAURA SMALL, an individual,
KATHRYN YONGE, an individual,
NATAUSHA HANSON, an individual,
KELLY HAY, an individual,
KATHERINE BERGMAN-CHAPMAN, an
individual, and PEGGY SCHULTZ, an
individual,

Case No.: 3:23-cv-01290-JR
JOINT STATUS REPORT AND
DISCOVERY PLAN

Plaintiffs,

v.

OREGON HEALTH AND SCIENCE
UNIVERSITY, an independent public
corporation,

Defendant.

Pursuant to Federal Rule of Civil Procedure 26(f), the parties conferred and submit this joint discovery plan and proposed case schedule pursuant to Rule 26(f), Local Rules 16 and 26, and this Court's January 16, 2024 Order (Dkt. 16).

A. DISCOVERY PLAN

- (a) The parties will exchange LR 26-7 initial discovery on July 1, 2024.
- (b) The parties anticipate taking discovery in accordance with the applicable civil rules and case law on subjects pertinent to their claims and/or defenses.
- (c) The parties anticipate seeking discovery of electronically stored information, including emails, as well as documents generally kept in the usual course of Defendant's business. The parties do not anticipate the discovery of electronically stored information to present unique or complex issues. The parties agree to work collaboratively according to the particular needs of the request regarding the form of request and production of ESI.
- (d) The parties do not anticipate that privilege issues will play a larger role in this case than they typically do in similar cases.
- (e) The parties do not agree at this time to limiting discovery beyond the limits imposed by the applicable federal and/or local rules. The parties agree to confer and work cooperatively where possible regarding this issue as discovery progresses.

B. PROPOSED CASE SCHEDULE

The Parties propose the following case schedule, which will allow the parties sufficient time to coordinate the discovery schedules in related cases (involving the same counsel and the same Defendants) to match the schedule here.

Description of Deadline	Date
Exchange of Initial Discovery	July 1, 2024
File Motions to Compel	January 31, 2025
Complete Fact Discovery	January 31, 2025
Joint ADR Report	February 28, 2025

Dispositive Motions	February 28, 2025
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The parties further propose that, within 14 days of the Court's ruling on dispositive motions, the parties will confer and jointly propose expert discovery and other pretrial deadlines to the Court.

DATED: May 28, 2024.

JANZEN LEGAL SERVICES, LLC

/s/ Caroline Janzen

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/s/ Sophie Shaddy-Farnsworth

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